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5
6 UNITED STATES DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

8 ZUNUM AERO, INC.,

9 Plaintiff,

10 v.

11 THE BOEING COMPANY; BOEING
12 HORIZONX VENTURES, LLC; SAFRAN,
S.A.; SAFRAN CORPORATE VENTURES,
13 S.A.S.; SAFRAN ELECTRICAL &
POWER, S.A.S.; SAFRAN HELICOPTER
14 ENGINES, SASU,

15 Defendants.

) Civil Action No. 2:21-cv-00896
)
) **STIPULATED MOTION FOR AN**
) **ORDER EXTENDING TIME FOR**
) **SPECIALLY APPEARING**
) **DEFENDANTS SAFRAN, S.A.; SAFRAN**
) **CORPORATE VENTURES, S.A.S.;**
) **SAFRAN ELECTRICAL & POWER,**
) **S.A.S.; AND SAFRAN HELICOPTER**
) **ENGINES, S.A.S.U. TO MOVE, PLEAD,**
) **OR OTHERWISE RESPOND TO**
) **PLAINTIFF ZUNUM AERO INC.'S**
) **FIRST AMENDED COMPLAINT BY 30**
) **DAYS TO AUGUST 18, 2021**
)
) NOTED ON MOTION CALENDAR:
) July 8, 2021 (Local Rule 7(d)(1))

1 Pursuant to Local Civil Rules 7(j) and 10(g), specially appearing defendants Safran
2 S.A., Safran Corporate Ventures, S.A.S. (“SCV”), Safran Electrical & Power, S.A.S. (“SEP”),
3 and Safran Helicopter Engines, S.A.S.U. (“SHE”) (collectively, the “Safran Defendants”) and
4 plaintiff Zunum Aero, Inc. (“Zunum”) hereby submit this stipulated motion to extend the
5 Safran Defendants’ time to move, plead, or otherwise respond to the First Amended
6 Complaint (“FAC”) by 30 days, to August 18, 2021.

7 WHEREAS, pursuant to an order of the Washington Superior Court prior to the
8 removal of this case to this Court, the Safran Defendants’ current deadline to respond to the
9 FAC is July 19, 2021. *See* ECF No. 2 (State Court Docket), Dkt. No. 52.

10 WHEREAS, good cause exists to extend the Safran Defendants’ deadline to move,
11 plead, or otherwise respond to the FAC because the parties are discussing a potential
12 resolution of Zunum’s claims against the Safran Defendants, and an extension of 30 days of
13 the Safran Defendants’ deadline to move, plead, or otherwise respond to the FAC would
14 provide the parties with additional time needed to discuss a resolution and avoid the
15 potentially needless expenditure of party and judicial resources on unnecessary motion
16 practice (including jurisdictional motion(s) and motion(s) to compel arbitration) in response
17 to the FAC.

18 WHEREAS, by entering into this stipulation, no Safran Defendant makes a general
19 appearance, submits to the jurisdiction of this Court, or waives any right or defense.

20 WHEREAS, by entering into this stipulation, Zunum expressly reserves all rights to
21 seek remand or otherwise challenge the removal of this action to this Court.

1 WHEREAS, this stipulated motion is filed in good faith and not for purposes of
2 delay, and will not alter any dates or schedules previously set by this Court.

3 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and
4 among Zunum and the Safran Defendants, subject to the Court's approval, that the deadline
5 for the Safran Defendants to move, plead, or otherwise respond to plaintiff's FAC is extended
6 by 30 days to August 18, 2021.

7 Dated: July 8, 2021

s/ Catherine S. Simonsen

Bryan A. Merryman (*pro hac vice* application
forthcoming)

Catherine S. Simonsen (WSBA # 45552)

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& POWER, S.A.S., and SAFRAN
HELICOPTER ENGINES, S.A.S.U.

17 Dated: July 8, 2021

s/ Eliot M. Harris

Eliot M. Harris (WSBA #36590)

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12 Attorneys for Plaintiff
13 ZUNUM AERO INC.

14 **~~PROPOSED~~ ORDER**

15 **IT IS SO ORDERED.**

16 Dated this 9th day of July, 2021

17 

18 UNITED STATES DISTRICT JUDGE
19 James L. Robart